

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case: 2:21-cr-20583

Judge: Murphy, Stephen J.

MJ: Patti, Anthony P.

Filed: 09-14-2021 At 03:33 PM

INDI USA V. VANDENDRIESSCHE (DA)

RYAN VANDENDRIESSCHE,

Defendant.

Violations:

18 U.S.C. § 922(a)(6)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. § 922(a)(6) – False Statement During Purchase of a Firearm

On or about August 25, 2020, in the Eastern District of Michigan, the defendant, Ryan Vandendriessche, in connection with the acquisition of a firearm, to wit: a RGuns KTA15, 5.56 caliber pistol, from TopGun Shooting Sports, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to TopGun Shooting Sports, which statement was intended and likely to deceive TopGun Shooting Sports, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473,

Firearms Transaction Record, to the effect that that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

18 U.S.C. § 922(a)(6) – False Statement During Purchase of a Firearm

On or about September 14, 2020, in the Eastern District of Michigan, the defendant, Ryan Vandendriessche, in connection with the acquisition of a firearm, to wit: a Glock model 21, .45 caliber pistol, from Downriver Guns and Ammo, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Downriver Guns and Ammo, which statement was intended and likely to deceive Downriver Guns and Ammo, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATIONS
18 U.S.C. § 924(d) together with 28 U.S.C. § 2461

The allegations contained in this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461.

Upon conviction of the offenses charged in this Indictment, the defendant Ryan Vandendriessche, shall forfeit to the United States any firearm and ammunition involved in or used in defendant's knowing violations.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

s/Benjamin C. Coats
BENJAMIN C. COATS
Chief, Major Crimes Unit
Assistant United States Attorney

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Dated: September 14, 2021

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United States District Court
 Eastern District of Michigan

Criminal Case Cover

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information		Companion Case Number: _____
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned: _____
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: <u>JGS</u>

Case Title: USA v. RYAN VANDENDRIESSCHE

County where offense occurred : Wayne

Check One: Felony Misdemeanor Petty

 Indictment/____ Information --- no prior complaint.

Indictment/____ Information --- based upon prior complaint [Case number: 20-mj-30477]

 Indictment/____ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

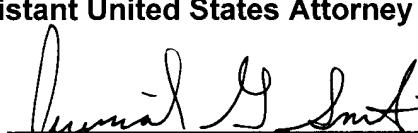
Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 14, 2021

Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.